## **Exhibit B**

## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:

Eduardo Garcia and Julia Escamilla

Case No.: 11-22208

Judge: Jack B. Schmetterer

Chapter: 7

, Debtor(s)

### **NOTICE OF MOTION**

TO: See Attached Service List

PLEASE TAKE NOTICE that on **Tuesday February 4, 2020, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, I will appear before the Honorable Jack B. Schmetterer, Bankruptcy Judge, or any other judge sitting in his stead, in Room **682**, the courtroom usually occupied by him, in the United States Courthouse, 219 S. Dearborn, Chicago, Illinois and then and there present Debtors' **Motion to Re-Open to Amend Schedules**, a copy of which is attached hereto, at which time and place you may appear if you see fit.

/s/ Salvador J. Lopez

Salvador J. Lopez ARDC # 6298522 Robson & Lopez LLC 180 W. Washington, Suite 700 Chicago, IL 60602 (312) 523-2021

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice and the attached Motion or Document(s) were filed with the court on January 28, 2020, and that the persons indicated by an asterisk (\*) are registrants with the Court's CM/ECF system and have, pursuant to Fed. R. Bankr. P. 7005 and 9036, and §II.B.2 of the Court's Administrative Procedures waived the right to receive notice of hearings and service of documents by personal service or first class mail in this case and consented to receive notice and service electronically; and that all other persons listed above and/or in the attached service list, were served by first class mail, on January 28, 2020.

/s/ Salvador J. Lopez

## Case 11 222 08-0 2502 190 cument of 1/25/20 File hte 763 061/28 page 09:56:48 9 to Document Page 2 of 6

### **SERVICE LIST**

\*Andrew J Maxwell, Esq.
maxwelllawchicago@yahoo.com, amaxwell@ecf.epiqsystems.com;
trustee@maxwellandpotts.com; cjcapo@maxwellandpotts.com;
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\*Patrick Layng 219 S. Dearborn Room 873 Chicago, IL 60604 USTPRegional11.ES.ECF@usdoj.gov

SEE CONTINUATION PAGES FOR ADDITIONAL PARTIES SERVED

294 Union St ment Page 3 of 6

Hackensack, NJ 07601-4303

0752-1 Case 11-22208

Northern District of Illinois

Eastern Division

Fri Jan 24 18:16:11 CST 2020

AFNI, Inc. 404 Brock Dr. P.O. Box 3517

Bloomington, IL 61702-3517

America's Servicing Company

P.O. Box 10328

Des Moines, IA 50306-0328

(p) AMERICAN HONDA FINANCE

Chicago, IL 60604-1702

P O BOX 168088

Eastern Division

219 S Dearborn

7th Floor

IRVING TX 75016-8088

Asset Acceptance LLC

PO Box 2036

Warren, MI 48090-2036

Associated Recovery Systems

PO Box 469046

Escondido, CA 92046-9046

Beta Finance P.O. Box 660232

Indianapolis, IN 46266-0232

Carolyn Bronke Wind DDS 507 S. LaGrange Road La Grange, IL 60525-5605 Direct Buy of Tinley Park 18400 S. 76th Ave. Suite B Tinley Park, IL 60477-6286 Diversified Adjustment 600 Coon Rapids Blvd NW Coon Rapids, MN 55433-5549

E R Solutions, Inc. P.O. Box 9004 Renton, WA 98057-9004 Enhanced Recovery Corporation 8014 Bayberry Rd Jacksonville, FL 32256-7412

First USA, NA P.O. Box 15298

Wilmington, DE 19850-5298

Freedman Anselmo Lindberg & Rappe 1807 West Diehl Road, Suite 333 P.O. Box 3228

Naperville, IL 60566-3228

GEMB/Sams Club DC PO Box 981400

El Paso, TX 79998-1400

HFC

P.O. Box 3425

Buffalo, NY 14240-3425

HSBC/Guitar 2700 Sanders Rd

Prospect Heights, IL 60070-2701

J.C. Chistensen and Associates, Inc

P.O. Box 519

Sauk Rapids, MN 56379-0519

Jesus Gamboa 5606 W. Cermak Road Cicero, IL 60804-2219

Kohl's/Chase

N56 W 17000 Ridgewood Dr Menomonee Falls, WI 53051-5660 LVNV Funding LLC PO Box 740281

Houston, TX 77274-0281

MiraMed Revenue Group Dept 77304 P.O. Box 77000

Detroit, MI 48277-0304

(p) NATIONWIDE CREDIT AND COLLECTION INC

ATTN BOB BECK 815 COMMERCE DR SUITE - 270

OAK BROOK IL 60523-8852

Richard J. Boudreau & Associates

5 Industrial Way Salem, NH 03079-4866

Sanjay S. Jutla, Esq. 55 E. Jackson, 16th Floor Chicago, IL 60604-4466

Sears/CBSD P.O. Box 6189

Sioux Falls, SD 57117-6189

(p) SPRINT NEXTEL CORRESPONDENCE ATTN BANKRUPTCY DEPT

PO BOX 7949

OVERLAND PARK KS 66207-0949

THD/CBSD PO Box 6497

Sioux Falls, SD 57117-6497

Collection Agency 1375 East Woodfiedl Rd., Suite #110 Schaumburg, IL 60173-5423 5620 Southwyck Blvd. Page 4 of 6 Toledo, OH 43614-1501

Maxwell Law Group LLC. 3010 N. California Ave. chicago, il 60618-7090

Eduardo Garcia 407 Beach Ave La Grange Park, IL 60526-5713 John A Rottier Katz Law Office 4105 W. 26th St Chicago, IL 60623-4313 Julia Escamilla 407 Beach Ave La Grange Park, IL 60526-5713

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St Room 873 Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

American Honda Finance 2170 Point Blvd Suite 100 Elgin, IL 60123 Nationwide Credit & Collection, Inc 815 Commerce Drive, Suite 100 Oak Brook, IL 60523 Sprint P.O. Box 4191 Carol Stream, IL 60197

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Atlas Acquisitions LLC 294 Union St. Hackensack, NJ 07601-4303 End of Label Matrix
Mailable recipients 36
Bypassed recipients 1
Total 37

## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:

Eduardo Garcia and Julia Escamilla

Case No.: 11-22208

Judge: Jack B. Schmetterer

Chapter: 7

, Debtor(s)

### MOTION TO RE-OPEN CASE TO AMEND SCHEDULES

NOW COME Debtors, Eduardo Garcia and Julia Escamilla ("Debtors"), and in support of their Motion to re-open and amend schedules, state as follows:

- 1. Debtors filed this Chapter 7 Bankruptcy on May 26, 2011.
- 2. Debtor's received an order of discharge in this case on September 7, 2011.
- 3. Debtors recently learned of a previously unknown asset, a claim against Wells Fargo Bank, N.A.
- 4. Since Debtors were unaware of this asset at the time they filed their bankruptcy, they did not disclose it in their bankruptcy petition and schedules.
- 5. Debtors now wish to re-open their bankruptcy case and amend their schedules to disclose the newly discovered asset.

WHEREFORE, Debtors requests that this Honorable Court grant the motion and enter an order:

- A. Re-opening their Chapter 7 Bankruptcy Case allowing them to amend their schedules;
- B. Any other relief that is just and proper.

Respectfully submitted,

/s/ Salvador J. Lopez
Attorney for Debtor

# Case 11-22208-02562 190 cument of 1/25/20 File hte762001/28/200 09:96:48900 est: Main Document Page 6 of 6

Salvador J. Lopez ARDC # 6298522 Robson & Lopez LLC 180 W. Washington, Suite 700 Chicago IL, 60602 (312) 523-2021